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ABSTRACT

This document contains instructions for developing comprehensive program plans at both the district and the school levels, as required under the 1973 Proposed Regulations for Consolidated Categorical Aid Programs in California Schools. The essential planning elements for both levels are identified; they stem from the premise that the specifics of educational programs are to be designed for actual student populations by the people who are directly concerned with those populations. The document has two major parts--one on district-level planning and one on school-level planning. Within each part, the arrangement of instructions follows as closely as possible the sequence in which the planning steps occur. At the end of each section is a list of "planning products," the particular written records to be produced in that step of the process. (Author/JG)

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Instructions for Comprehensive Program Planning With Addenda

CALIFORNIA STATE DEPARTMENT OF EDUCATION
Wilson Riles – Superintendent of Public Instruction
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(1974 Edition)

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Introduction

This document contains instructions for developing comprehensive program plans at both the district and the school levels, as required under *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools.*[1] The essential planning elements for both levels are identified; they stem from the premise that the specifics of educational programs are to be designed for actual student populations by the people who are directly concerned with those populations.

Some districts are developing comprehensive program plans for the first time. For them the particular emphasis may be on the creation of advisory committees and the working relationships the committee members have with the teaching and administrative staffs and the governing board. Other districts have already developed comprehensive plans, and in each step of the planning process they will be producing amendments to their plans. In either case the aim is deliberate, purposeful planning that is responsive to the needs of the students.

This document has two major parts: one on district-level planning and one on school-level planning. These levels of planning have important connections, and Figure 1 shows the connections as well as the flow of the process at both levels. Within each part of the document, the arrangement of instructions follows as closely as possible the sequence in which the planning steps occur. At the end of each section are listed the "planning products," the particular written records to be produced in that step of the process. The Department asks that the district-level planning products be assembled and kept together at the district office. Similarly, the Department asks that school-level planning products be assembled and kept together at each school's main office.

For the district and the individual participating schools, the planning products provide the basis for program implementation as well as information necessary for preparing the consolidated application. This document contains no information regarding the submission of products to the Department of Education. Another document will give instructions for preparing the consolidated application and for submitting material to the Department; other documents will describe fiscal and program reporting requirements and give consolidated evaluation instructions.

Two types of advisory committees are key elements of the entire process. The District Advisory Committee participates fully in all district planning activities, giving reaction to proposals and making recommendations to the district administration and the school district governing board. The School Advisory Committee participates fully in each planning activity at the school level. Also, throughout the year it gives advice and assistance for the program management and evaluation functions. Although these committees do not show as "process" elements in the chart, they are vital to the health of the educational programs. Parents and community representatives provide invaluable participation as advisory committee members and in other capacities in planning and operating public school programs; they are a priceless resource for comprehensive program planning.

[1] *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools.* Sacramento: California State Department of Education, 1973.

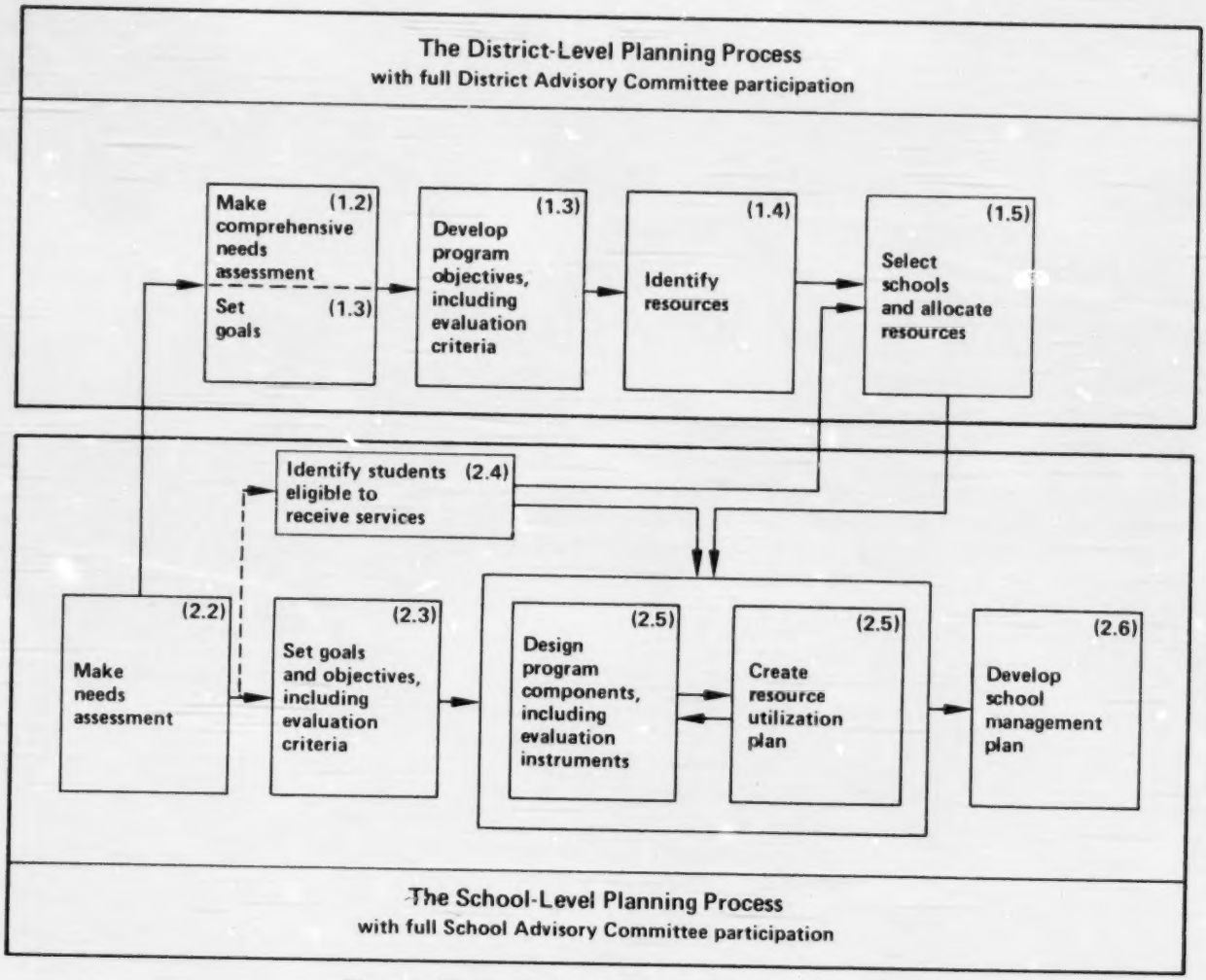

Figure 1. The comprehensive program planning process

1.0 Instructions for Comprehensive Program Planning at the District Level

The purpose of this part of the document is to describe the activities which constitute comprehensive program planning at the district level. The general process to be followed in comprehensive planning and the "products" to be developed are prescribed by the state, but the particular methods and procedures to be employed are to be selected at the local level. For example, the preparation of a needs assessment is a state requirement, but the district may design its own procedure for making the needs assessment, or it may adopt a procedure developed elsewhere. In any event, full participation by the District Advisory Committee is required in all district-level activities.

Some districts have been using a systematic approach to planning for several years; others are just beginning. Consequently, those districts initiating comprehensive planning this year will develop new goals, objectives, and program sturcture. Other districts will update needs assessments and refine existing programs. In either case it is clear that although a comprehensive program plan may be complete, it is never final.

The instructions in this section will guide administrators, teachers, parents, and members of the community through the annual planning process in a district, recognizing that both experience and changing conditions will determine the emphases to be given in the planning as well as the particular difficulties encountered in any given year.

1.1 District Advisory Committee

The proposed consolidated program regulation entitled "Parent and Community Involvement" requires the establishment and operation of a District Advisory Committee.[2] An existing committee which meets, or can be augmented to meet, the membership requirements given in Section 1.1.1 will satisfy this requirement. Equitable representative processes shall be used to establish the committee.

[2] *Proposed Regulations*, p. 2.

1.1.1 Membership requirements for the District Advisory Committee

A majority of the voting membership of the District Advisory Committee shall be parents (not employed by the district) of students eligible for categorical services. The District Advisory Committee shall be composed of each of the following:

(1) Parents who reflect the ethnic and socioeconomic composition of the district (Parents of students in all age spans should be included. If the district receives, or is competing for, Early Childhood Education funds, parents of pupils in kindergarten through grade three must be represented.)
(2) Representatives from nonschool community social service agencies such as mental health groups, United Crusade boards, or city-connected agencies
(3) Representatives from the business community, such as store owners, managers, or supervisors
(4) Classified aides, teacher assistants, or other support personnel
(5) Teachers and administrators (If the district receives, or is competing for, Early Childhood Education funds, teachers of students in kindergarten through grade three must be included.)
(6) Representatives of nonpublic schools when categorical resources are available to nonpublic schools

If individual members represent more than one of the above groups of people, the total membership may be reduced accordingly. Also, other representatives may be added as long as parents not employed by the district remain a majority.

1.1.2 Committee responsibilities

The District Advisory Committee has responsibility for giving advice and making recommendations regarding the following:

(1) Developing the comprehensive district plan, including establishment of a time line
(2) Making a district needs assessment, including the process of school-by-school needs assessment
(3) Establishing district goals and objectives
(4) Setting the order in which schools will enter the Early Childhood Education program

An additional responsibility of the District Advisory Committee is aiding in the identification of human and material resources available from the community.

1.1.3 Operating procedures

The District Advisory Committee operates in the following ways:

(1) Establishing regular two-way communication channels with the school administration as well as the governing board
(2) Serving as advocate for active parental involvement at the school level in the functions of program planning, implementation, and evaluation
(3) Advocating processes at the school level for providing reports to parent groups and school and nonschool community groups at times other than annual reporting times

The district administration has responsibility for arranging staff assistance for the District Advisory Committee.

1.1.4 Planning products

The following records relating to the District Advisory Committee are to be kept at the district office:

(1) The name and title of the person employed by the district who is responsible for organizing the District Advisory Committee
(2) A list of committee members by name, address, and telephone number for each of the categories of representation identified in 1.1.1; a ledger recording changes in membership
(3) The schedule and information on content of training activities for committee members
(4) A schedule of committee meeting dates and locations of meetings
(5) A description of the communication channels established for providing information to the committee and for bringing recommendations of the committee into the decision-making process
(6) A copy of the major recommendations made or endorsed by the committee in each step of the planning process

1.2 District Needs Assessment

The minimum requirement for the comprehensive district-level needs assessment is the consolidation of all data in each school-level needs assessment. (Each school receiving categorical resources must prepare a needs assessment, including the categories described in Section 2.2.1.) However, in addition to this compilation, the district should consider in its needs assessment any factors which affect two or more attendance areas; e.g., comparisons of the cultural diversities at different schools, districtwide opportunities for experiences outside the classroom, and potentials for interchange among school personnel or students. Needs associated with district and school management should also be addressed.

1.2.1 Elements of the needs assessment

The district-level needs assessment will require a compilation of school-level data in the following categories:

(1) Base line data on the student population as described in Section 2.2.1(1)
(2) Data on ability (or achievement measures) of the student population as described in Section 2.2.1(2)
(3) Data on affective areas of student development from such instruments as the school may employ and from teacher observations
(4) Data on psychomotor areas of student development from such instruments as the school may employ and from teacher observations
(5) Appraisals of the levels of social and cultural understanding within the student population
(6) Appraisals of the degree to which the present instructional program provides diagnostic/prescriptive instruction for students on an individualized basis
(7) Appraisals of health and social services available to students, both within and outside the school program
(8) Appraisals of staff needs (Staff needs may range from personal to institutional. Included are skills in communicating with other staff members, with students, and with parents;

skills in managing the teaching-learning environment; and skills in using a wide variety of teaching strategies and materials related to individual student learning styles. At the district level attention should be given to needs in career development and in affirmative action.) (9) Appraisals of the nature and extent of parent involvement in program planning and implementation and examinations of the parent education opportunities

In addition, the needs assessment includes an analysis of the district's management system. This analysis can identify missing or inappropriate managerial assignments; needs for more complete time lines, schedules, or different review procedures; or areas of needed negotiation among administration and staff to clarify responsibilities for categorical program development. It should give particular attention to the decision-making process involving parents and other citizens.

1.2.2 Planning products

Each of the school-level compilations and the management analysis listed in Section 1.2.1 are planning products from the district needs assessment.

1.3 District Goals and Objectives

Goals of a school district stem from what the citizens of a community believe to be the purposes of the public schools. "Goal" is defined in Education Code Section 7562 as "... a statement of broad direction or intent which is general and timeless and is not concerned with a particular achievement within a specified time period."

One point of view in goal setting is that goals exist independent of conditions in the district; the goals are ideals. When this concept is followed, goal setting is the first step in district comprehensive planning, and citizen expressions of purposes and ideals are used rather than data from the needs assessment.

Another point of view in goal setting is that goal statements are statements of desired conditions. When this concept is followed, goals are written in terms of the parameters of the district needs assessment. The appraisal of existing conditions is contained in the district needs assessment; the statement of desired conditions which derives from the needs assessment then becomes synonymous with the goals.

Either of these goal-setting concepts is acceptable, as each concept provides the "broad direction or intent" of district goals.

When the district decides to what extent it will strive to meet specific desired conditions identified in its needs assessment, it sets objectives. Education Code Section 7563 defines "objective" as "... a devised accomplishment that can be verified within a given time and under specifiable conditions which, if attained, advances the system toward a corresponding goal." Verification rests on the evaluation criteria chosen when the objectives are defined. The time frame for some objectives may be short-range; for others it may be intermediate or long-range.

1.3.1 Frequency of goal and objective setting

Districts which are establishing goals and objectives for the first time will carry out the complete goal-setting process. Districts which have developed goals within the last three years may retain the goals or modify them as desired. Objectives are generally set on an annual basis, but many of them may be readopted in successive years provided appropriate modifications are made to reflect changes in the needs assessment.

1.3.2 Role of the District Advisory Committee in setting goals and objectives

The District Advisory Committee will participate fully in the district goal-setting process and may provide the primary citizen input. However, the involvement of many citizens of the district can be obtained through the use of a poll or questionnaire. In any event, the District Advisory Committee offers advice and recommendations on the goals to be adopted.

The District Advisory Committee similarly gives advice and makes recommendations for program objectives in collaboration with the professional staff of the district.

1.3.3 Evaluation criteria

For each program objective there shall be evaluation criteria: clear and concrete ways of knowing whether or to what extent that particular objective has been achieved. Further descriptions and recommendations are given in

A Handbook for the Evaluation of Multifunded Educational Programs.[3]

1.3.4 Priority setting

Since the differences between existing and desired conditions are always more than can be surmounted in a given year, decisions on the relative importance of needs are required. By assigning priorities to the needs (or to the goals if they are expressions of intent to meet unmet needs), the district is able to select objectives which meet the higher priorities. A rank ordering might be performed; or, as an alternative, the needs might be grouped into categories such as critical, important, or desired. For the more important goals, a greater number of objectives or objectives with earlier completion dates are appropriate. Fewer or longer-range objectives would be chosen for less important goals.

1.3.5 Planning products

The planning products for district goals and objectives are as follows:

(1) A list of district goals (with indications of priority level if the goals are used as statements of desired conditions)
(2) A list of district program objectives and the associated evaluation criteria for 1974-75 (An objective for each goal is not necessarily required; conversely, there may be several objectives correlated with certain goals.)

1.4 Identification of Resources at the District Level

A complete inventory of available resources is needed before the school district can prudently allocate those resources. In addition to dollars available for purchasing services and materials, resources include many persons and establishments in the district. The district also has materials, equipment, and facilities that it can make available for school-level functions.

The Department of Education notifies the school district of state and categorical resources as well as apportionment monies to which the district is entitled or for which it may compete. The other resources must be identified by the district.

[3] *A Handbook for the Evaluation of Multifunded Educational Programs.* Prepared under the direction of Alexander I. Law, Chief, Office of Program Evaluation and Research. Sacramento: California State Department of Education, 1973.

1.4.1. Categories

Categories of resources include the following:

(1) Resources available from local taxes and state apportionments
(2) State resources available by formula or entitlement
(3) Federal resources available by formula or entitlement
(4) State and federal resources available on a competitive basis
(5) Persons and business establishments in the district which can offer assistance or learning opportunities to the students
(6) Health and social-service agencies
(7) Various buildings and other locations (such as museums and arboretums) which have educational value

1.4.2 Planning product

A record of both financial and other resources identified by the district, including at least the seven categories listed in Section 1.4.1, must be kept in the district office.

1.5 Selection of Schools and Allocation of Categorical Resources

Most categorical resources are intended for groups of students who, for various reasons, are less successful in school than the student population as a whole. The dominant but not exclusive criterion for receiving categorical resources is educational need. The regulations governing selection and allocation are contained in the *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools.* Nonetheless, opportunity exists for local discretion in allocating resources, particularly when a school is eligible for more than one source of funds.

Allocations of resources made under the school district's comprehensive plan must relate to the district's program objectives, which in turn relate to the district needs assessment. Further, the availability and allocation of local human resources and other community resources must be considered by the district in the allocation of categorical resources.

Note: The instructions in this document apply to the seven categorical programs funded in 1974-75 through the consolidated application. These programs are as follows:

School Library Resource Programs (Phase 1 of Title II of the Elementary and Secondary Education Act of 1965
Special Teacher Employment Program
Special Elementary School Reading Instruction Program (Miller-Unruh Basic Reading Act)
Early Childhood Education Programs
Educationally Disadvantaged Youth Programs (SB 90)
Compensatory Programs under Title I of the Elementary and Secondary Education Act of 1965
State Preschool Programs

The basic restrictions and requirements governing the allocation of each categorical source of funds are contained in sections 1.5.1 through 1.5.10. It must be understood that the allocation of all seven sources covered in these is to be made simultaneously.

Simultaneous allocation is not as complex a process as it may appear to be. First, preschool funds are obviously unavailable for kindergarten or higher grades. Next, because both Miller-Unruh and Special Teacher Employment schools are identified by the state, district selection of schools is not at issue. Further, the district allocates ESEA, Title II, Phase 1, funds according to library and media needs at the school level. The focus for these funds is so well defined that the school selections can be made almost independently of other resources available.

The three categorical resources which require simultaneous consideration are Educationally Disadvantaged Youth; ESEA, Title I; and Early Childhood Education. Generally, substantial overlap exists as to schools eligible for these three sources. No restriction exists as to the proportion of resources used in different schools as long as individual regulations are not violated. In schools with two or more different categorical resource allocations, the school is to have a consolidated, comprehensively planned categorical program even though expenditures from each funding source must be identified. However, the funding of individual program components by more than one categorical source is permissible. When more than one categorical source is used, a record must be kept of the prorations charged to each funding source.

1.5.1 Identification of schools according to educational needs of students

Both Early Childhood Education and Educationally Disadvantaged Youth programs require that schools of "greatest educational need" be identified. The level of need is measured principally by the number or percent, or combination of both, of students scoring in the lowest quartile on reading and mathematics achievement tests. Other factors, such as poverty levels, the pupil transiency rate, and the number of pupils with first language other than English may be incorporated. The specific criteria and the manner of quantifying educational needs for school attendance areas together form one major planning product. A record of quantified educational need at each school is the critical planning product for the selection of schools and allocation of categorical resources.

1.5.2 Identification of school attendance areas according to concentration of low-income families

For the allocation of ESEA, Title I, funds, it is necessary to identify the concentration of children from low-income families in each attendance area. Low-income families can be identified by the use of 1970 census data, AFDC data, or secondary source data. A reference for detailed information is the HEW publication, *Title I, ESEA–Selecting Target Areas.*[4] The district may use either percent or number, or combination of both, of children from low-income families in computing concentrations. A record of this concentration in each attendance area is a specific planning product.

1.5.3 Allocation of ESEA, Title II, Phase 1, funds

ESEA, Title II, Phase 1, funds are intended for the purchase of library and media materials. The district inventory of resources serves as the reference for identifying the greatest needs within the district. The district then allocates the ESEA, Title II, Phase 1, funds accordingly.

1.5.4 Allocation of Special Teacher Employment funds

Both income and educational need criteria are utilized in the selection of schools to receive Special Teacher Employment funds. The state identifies the schools and the funds available to the school districts.

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[4] *Title I, ESEA–Selecting Target Areas: A Handbook for Local Title I Officials,* OE-37073. Washington, D.C.: U.S. Department of Health, Education, and Welfare, 1971, pp. 3–11.

1.5.5 Allocation of Special Elementary School Reading Instruction Program (Miller-Unruh) funds

Individual school eligibility for teachers and/or aides paid in part from Miller-Unruh funds is determined when the funds available for the district are determined. The district may add district funds (when necessary) to hire the teachers and/or aides.

At an elementary school receiving (or competing for) Early Childhood Education (ECE) funds for its pupils in kindergarten and grades one through three, the sum of Miller-Unruh and Early Childhood Education funds may not exceed $130 (or $195 for educationally disadvantaged students) per student. At such schools the district has the choice of utilizing Miller-Unruh funds with a corresponding reduction of ECE funds or of applying the full $130 (or $195) per pupil from ECE funds with no Miller-Unruh support.

At a school receiving ECE funds for pupils in kindergarten and grade one or kindergarten and grades one and two, the ECE award is reduced by one-half or three-quarters respectively of the Miller-Unruh funding for the school.

In the case of a school which is newly competing for ECE funds, the district may want to plan for Miller-Unruh services as a minimum and have a plan contingent on an ECE award which either includes or does not include Miller-Unruh funds.

1.5.6 Award of Early Childhood Education Program funds

Each district receiving or competing for ECE funds must have a master plan for phasing schools into the ECE program. This plan must specify the sequence in which the district selects schools to compete for ECE funds. In any fiscal year at least half of the schools in the program must be schools with students having the greatest educational need; the others are selected by the governing board according to locally chosen criteria contained in the district master plan for Early Childhood Education. Hence, allocations to schools are determined by the district master plan and the success of individual schools in competing for expansion funds.

A district will automatically receive ECE funds in 1974-75 for schools which entered the program in 1973-74 because initial awards for specific schools are made for three years. Early in March, 1974, the Department of Education will notify each district of its eligibility to compete for increased funding in 1974-75. This eligibility will be for a percent of the district's average daily attendance in kindergarten and grades one through three. Details of the award criteria and procedures are contained in "Awarding Early Childhood Education Expansion Funds"[5]

Note: If the district elects to use Miller-Unruh funds at a given school, the ECE award will be reduced by the Miller-Unruh amount (half or three-quarters of the Miller-Unruh amount if the ECE program includes only kindergarten and grade one or kindergarten and grades one and two respectively at the school).

1.5.7 Allocation of Educationally Disadvantaged Youth Program funds

Educationally Disadvantaged Youth (EDY) funds are allocated according to the record of educational need at each school described in 1.5.1. The amount allocated to a given school is determined by the district provided that at least those students scoring in the lowest quartile in a test of basic skills receive services. The regulations require that the youngest EDY students in the district have priority. Schools must be selected on this basis.

1.5.8 Allocation of ESEA, Title I, funds

Schools to receive ESEA, Title I, funds are selected in rank order of concentration of children from low-income families as specified in the tabulation called for in Section 1.5.2. The amount allocated to a given school is determined by the district provided that at least those students scoring in the lowest quartile in a test of basic skills receive services. The regulations require that the youngest EDY students in the district have priority. Schools must be selected on this basis.

1.5.9 Allocation of California State Preschool Education Program funds

California State Preschool Education Program funds are intended for children of low-income

[5] "Awarding Early Childhood Education Expansion Funds." Prepared by the Early Childhood Education Program manager and adopted by the California State Board of Education in December, 1973.

families, with priority given to children for whom English is a second language. Preschool classes may be operated by any public agency or any private agency which meets eligibility requirements. Classes may be operated without regard to specific school sites but should preferably be located where children who reside within the attendance areas of schools eligible for ESEA, Title I, funds or Educationally Disadvantaged Youth Program funds can be served.

1.5.10 Maximum and minimum levels of service and contingency planning

For each student receiving services under ESEA, Title I, or the Educationally Disadvantaged Youth Program, the allocation from combined categorical aid funds must amount to between 50 and 80 percent of the average per-student expenditure, excluding categorical funds, in elementary schools in California. But many schools with educationally disadvantaged students are eligible for more than one categorical source. In particular, a number of schools will have Early Childhood Education, Educationally Disadvantaged Youth, and ESEA, Title I, funds. Funds from these sources are combined through district decisions in a manner that satisfies the minimum and maximum levels of expenditure per student.

For schools currently in the Early Childhood Education Program, funds are assured for the next fiscal year. For students in these schools who have great educational need, the district may allocate available Educationally Disadvantaged Youth and ESEA, Title I, funds. The district can, for example, allocate $70 of Educationally Disadvantaged Youth money and $200 of ESEA, Title I, money to go with $130 (plus $65 in most instances) of Early Childhood Education money for each student with great educational need at an ECE school. At non-ECE schools, the district can allocate, for example, $350 of ESEA, Title I, money plus $90 of Educationally Disadvantaged Youth money per participating student. Any combinations which do not violate eligibility requirements of individual funding sources are permitted.

Schools which are newly competing for Early Childhood Education funds should draw up a contingency plan for allocating those funds. The district will first allocate certain Educationally Disadvantaged Youth and ESEA, Title I, funds to these schools, which will then prepare a comprehensive plan for participating students. The competing school will also prepare a restructuring plan for its entire kindergarten and grades one through three population as part of its competition for funds. The ECE funds the school receives if it competes successfully provide for restructuring activities and for a more fully developed individualized program than would have been possible without the ECE funds.

If the school competes successfully (and approximately 80 percent of the candidates will be successful), the district can amend its EDY or ESEA, Title I, allocation plan to bring categorical services to additional schools. The amendment is to be made after the district has been notified of an ECE award. It is also possible that notification of changes in federal funding levels will be available at that time. The district can amend its allocation plan to account for these changes as well as those resulting from the ECE awards.

1.5.11 Planning products

Planning products required from the selection of schools and allocation of categorical resources are the following:

(1) The specific criteria and the manner of quantifying educational need for school attendance areas
(2) A record of quantified educational need at each school
(3) A record of the concentration of children from low-income families in each attendance area
(4) A listing of the categorical sources from which each school is eligible to receive funds in 1974-75
(5) A tabulation of resources, both regular and categorical, which will be allocated to each school in 1974-75 (The specific categories of resources used should be exactly the ones that are communicated to the persons responsible for school-level planning.)

2.0 Instructions for Comprehensive Program Planning at the School Level

The purpose of this part of the document is to describe the activities which constitute comprehensive program planning at the school level. The general process to be followed and the "planning products" to be developed are prescribed, but the particular methods and procedures to be employed are to be chosen by the school principal and staff in collaboration with the School Advisory Committee. In some schools the advisory committee as a whole may work with the principal and designated staff in each phase of the planning process; in other schools several working groups, composed of both staff and committee members, may be formed to prepare recommendations in chosen areas.

The School Advisory Committee will play a major role in performing the school's needs assessment, in selecting school goals and program objectives, and in identifying evaluation criteria and the reporting procedures to be used. (Refer to Figure 1 for the flow of activities.) Program design and the school management plan are primarily the responsibility of members of the professional staff of the school, although the staff must provide full information and explanation to the committee throughout the design process.

The primary school-level planning requirement contained in the consolidated program regulations is that the use of categorical funds be planned in conjunction with the use of other local and state resources. In those elementary schools receiving Early Childhood Education funds, a comprehensive program plan (utilizing *all* resources available to the school) for all pupils in the grade levels covered is required. In other age spans and in all schools, comprehensive program planning for students who will receive benefits from categorical funding is required.

School programs may include many components. Required program components are: instructional, including reading, language development, mathematics, and multicultural education; staff development; parent involvement; parent education; and health/auxiliary services. Deliberations and selections at each point in the planning process will occur in terms of these components and others chosen by the school. As the school plan is developed, the staff, in consultation with the School Advisory Committee, is responsible for establishing relative emphases as well as specific program content. The focus throughout is to be on the characteristics of the actual student population in the school.

2.1 School Advisory Committee

The consolidated program regulation entitled "Parent and Community Involvement" requires the establishment and operation of a School Advisory Committee at each school for which funds are sought through the consolidated application.[1] An existing committee which meets, or can be augmented to meet, the membership requirements given in Section 2.1.1 will satisfy this requirement. Equitable representative processes shall be used to establish the committee.

2.1.1 Membership requirements for the School Advisory Committee

A majority of the voting membership of the School Advisory Committee shall be parents (not employed at the school) of students eligible for categorical services. The School Advisory Committee shall be composed of each of the following:

(1) Parents who reflect the ethnic and socioeconomic composition in the school's attendance area
(2) Parents of students in all the age spans included at the school
(3) Teachers, aides, support personnel, administrators, and community representatives (If the school receives, or is competing for, Early Childhood Education funds, teachers in the kindergarten through grade three age span must be represented.)

[1] *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools.* Sacramento: California State Department of Education, 1973, p. 2.

Individual parents may represent both an ethnic group and an age span as listed in (1) and (2) in the preceding list; the total membership may be reduced accordingly as long as a distribution of ethnic and age-span representation is reflected in the committee. Other members may be added as long as parents not employed at the school remain a majority.

2.1.2 Committee responsibilities

The School Advisory Committee has the following responsibilities:

(1) To participate in the processes of needs assessment and the setting of goals and objectives
(2) To ensure that technical evaluation advice is sought during the program planning process to determine whether the proposed evaluation process and instruments will adequately reflect the achievement of program objectives
(3) To advise the principal and staff regarding staff development and inservice training
(4) To arrange with the principal and staff for direct parental involvement in classroom activities and in program evaluation
(5) To advise the principal and staff on programs for comprehensive parent education

If the school receives (or is competing for) Early Childhood Education funds, the School Advisory Committee shall advise the principal and staff regarding a program of restructuring instruction in kindergarten through grade three with emphasis on an individualized, diagnostic approach.

2.1.3 Operating procedures

The School Advisory Committee participates fully in each phase of the planning process, and the chairperson signs an assurance for each phase, attesting to that participation. In addition, the School Advisory Committee actively seeks ways to provide information about program planning and implementation to citizens of the school attendance area and receives suggestions and reactions from these citizens.

2.1.4 Planning products

The following records relating to the School Advisory Committee are to be kept at the school's main office:

(1) A list of the persons appointed to the School Advisory Committee by name, address, and telephone number for each of the categories of representation identified in 2.1.1; a ledger recording changes in membership
(2) The schedule and information on content of training activities for committee members
(3) A schedule of dates and locations of committee meetings
(4) A copy of the major recommendations made or endorsed by the committee in each step of the planning process

2.2 Needs Assessment

School-level program planning begins with needs assessment. The first step is to establish a clear record of existing conditions.

The needs assessment deals not only with specific characteristics of the student population, but also with the several components of the school's program. The needs assessment provides the information base for program design.

2.2.1 Elements of the needs assessment

Essential elements of the needs assessment at each school are as follows:

(1) Base line data on the student population
  (a) Numbers of students
  (b) Ethnic and socioeconomic makeup of the student population
  (c) The numbers of students with English as a second language
  (d) Transiency rates of students
  (e) Numbers of exceptional students: physically handicapped, mentally handicapped, and gifted
  (f) The nature and extent of student background factors such as cultural opportunities, travel, and the community environment
  (g) Student health data
(2) Ability (or achievement measures) of the student population
  (a) Diagnostic data obtained in the process of choosing instructional activities for individual students (Such data would be compiled and summarized for the purposes of needs assessment.)
  (b) Achievement data obtained at the school from whatever performance measures are employed at the school (This includes aggregate data from criterion-referenced achievement testing, data from matrix sampling of school achievement, and data from standardized achievement tests administered.)

(3) Data on affective areas of student development from such instruments as the school may employ and from teacher observations
(4) Data on psychomotor areas of student development from such instruments as the school may employ and from teacher observations
(5) Appraisal of the levels of social and cultural understanding within the student population
(6) Appraisal of the degree to which the present instructional program provides diagnostic/prescriptive instruction for students on an individualized basis
(7) Appraisal of health and social services available to students, both within and outside the school program
(8) Appraisal of staff needs (Staff needs may range from personal to institutional. Included are skills in communicating with other staff members, with students, and with parents; skills in managing the teaching-learning environment; and skills in using a wide variety of teaching strategies and materials related to individual student learning styles.)
(9) Appraisal of the nature and extent of parent involvement in program planning and implementation and an examination of the parent education opportunities

2.2.2 Planning products

All of the data and appraisals identified in Section 2.2.1 are planning products for school-level needs assessment.

2.3 Goals and Objectives

While districtwide goals and program objectives may be maintained for three years before major reexamination and revision are necessary, school-level goals and objectives must be established annually. Among the many desired conditions which are derived from the needs assessment, some are selected as goals. Each school goal expresses the intent to change from an existing to a desired condition. School-level goals and objectives are developed in light of district goals and objectives. Unique school characteristics, nonetheless, inevitably necessitate variations of detail and emphasis between the district and school-level goals and objectives.

2.3.1 Goals

Some procedure for indicating relative importance or urgency of needs should be employed. A complete ranking might be performed; or, as an alternative, the needs might be grouped into such categories as critical, important, or desired. Goals then are arranged into a list corresponding to the ranking or into a set of categories. The goal statements describe in broad terms the conditions desired.

2.3.2 Program objectives

Program objectives are correlated with goals, with the possibility of more than one objective for a given goal. Objectives identify desired outcomes in measurable terms within given time frames. Most school-level objectives will be for the school year, but certain objectives may be appropriately chosen for two- or three-year intervals.

2.3.3 Evaluation criteria

The identification of criteria for judging the accomplishment of program objectives accompanies the selection of those objectives. In fact, the objectives cannot be said to exist without corresponding evaluation criteria. Procedures for collecting evaluation data are established as part of program design. Finally, the school develops a plan for reporting the evaluation results. Further descriptions and recommendations are given in *A Handbook for the Evaluation of Multifunded Educational Programs.*[2]

2.3.4 Planning products

The planning products for school-level goals and objectives are as follows:

(1) A listing of school goals with indications of priority level
(2) A list of school program objectives, correlated with the school goals, with evaluation criteria for judging the accomplishment of the objectives

2.4 Identification of Students to Receive Services from Categorical Resources

The purpose of categorical aid is to provide services to selected students in addition to the "regular" services provided with school district funds. Consequently, identification of participating students is an essential step in school-level program planning. In the planning of programs for 1974-75, the number of students eligible to

[2] *A Handbook for the Evaluation of Multifunded Educational Programs.* Prepared under the direction of Alexander I. Law, Chief, Office of Program Evaluation and Research. Sacramento: California State Department of Education, 1973.

participate is estimated by the school. This tabulation affects the type and scale of the program component design. In 1974-75, *individual students* are identified as participants and receive the program services designed in the planning process. Because the number of participating students varies only slightly from year to year, little difficulty exists in adjusting to differences between actual number of students and the previously estimated number.

2.4.1 Students who receive Early Childhood Education Program services

In the Early Childhood Education (ECE) Program, every child enrolled in the participating grades of a participating school receives services. Further, for students who score below the first quartile on a standardized achievement test or a developmental assessment instrument or who have serious deficiencies in verbal functioning, additional services may be provided from the additional ECE funds allowed for educationally disadvantaged youth.

2.4.2 Students who receive Educationally Disadvantaged Youth services

Educationally Disadvantaged Youth funds are intended to provide services for students who score below the second quartile of achievement in reading and for students who have additional educational handicaps because of linguistic, cultural, economic, and/or environmental differences. Services must be concentrated on students with the greatest educational needs. Further, the regulation on "Concentration of Services" requires that services be provided to the youngest of the eligible students when funds are insufficient to provide for all of those eligible.[3]

2.4.3 Students who receive ESEA, Title I, services

ESEA, Title I, funds are intended to provide services for educationally disadvantaged students. Children are eligible for services if they score below the fiftieth percentile on standardized achievement tests. Priority, however, shall be given to those who score below the twenty-fifth percentile and/or those who have serious deficiencies in verbal functioning because of linguistic, social, cultural, or economic isolation. The law requires that recipient students be between the ages of three and twenty-one and not have completed high school. Further, the regulation on "Concentration of Services" requires that services be provided to the youngest of the eligible students when funds are insufficient to provide for all of those eligible.[4]

2.4.4 Students who receive services under ESEA, Title II, Phase 1

In Title II of ESEA, no question of participation exists because funds are allocated to the school for library and media materials.

2.4.5 Students who receive services under the Special Elementary School Reading Instruction Program (Miller-Unruh)

In the Special Elementary School Reading Instruction Program (Miller-Unruh), a specialist teacher in reading (1) supplements the reading instruction provided in regular classes for all students in grade one; and (2) provides instruction to small groups of students and to individual students in grades two and three who have been determined to have reading disabilities. Priority for the services of the special teacher in reading shall be given to students with the greatest educational need as determined by standardized achievement tests.

Special reading aides provided through the use of Special Elementary School Reading Instruction Program (Miller-Unruh) funds shall be assigned to work with students served by the reading specialist. In coordination with the classroom teacher and building administrator, the reading specialist shall determine where and how the aides will carry out their tasks. Priority for the services of the aides shall be given to those students who enable the school to qualify for this funding.

2.4.6 Students who receive Special Teacher Employment Program services

The intent of the Special Teacher Employment Program is to reduce the pupil-teacher ratio in regular classrooms in kindergarten and grades one through six. No question exists concerning participation.

2.4.7 Students who receive services under the California State Preschool Program

To be eligible for entrance into a State Preschool Education Program, children must have

[3] *Proposed Regulations*, p. 4.

[4] *Proposed Regulations*, p. 4.

reached their third birthday and have not yet reached the legally eligible age for kindergarten.

2.4.8 Articulation with preschool and child care programs

Primary programs in public schools shall be articulated with preschool and child care programs provided through private agencies as well as through the public school system. In particular, children formerly enrolled in compensatory preschool education programs are to be included in compensatory primary education programs.

2.4.9 Emphasis on longitudinal services

Children severely disadvantaged educationally may need to be provided with several years of additional services. These children should receive services from categorical resources from the beginning of their schooling (preschool or kindergarten) until they attain success comparable to that of the student population as a whole. A minimum of three years is recommended for most of these children; and, if needed, a longer period is recommended.

2.4.10 Planning product

For each categorical resource, a record of the estimated number of students to receive services in 1974-75 is to be kept, by grade level, in each school's main office.

2.5 Program Design, Including Resource Utilization Plans

Program design is the "what will be done and how" phase of school-level planning. It defines the means that will produce the ends already established as program objectives. Program design is carried out by the principal and the professional staff. The elements are highly interrelated, and it may be expected that repeated considerations of each element will be necessary.

Program design must encompass all program components. Because the identification and delineation of program alternatives includes specification of necessary resources, the program design phase of the planning process must incorporate the school's resource utilization plan.

Another aspect of program design is the provision of evaluation procedures. Evaluation criteria are established along with the program objectives, but the selection of particular evaluation instruments may reasonably be considered part of program design.

2.5.1 Designing of instructional components

For the designing of instructional components, perhaps the most demanding part of the planning process, the Department of Education has the least specific instructions. The reason is that the Department believes that instructional components should be designed by the professional staff at the school level to accomplish the school's own program objectives.

The underlying point here is that instructional activities do not (or should not) merely happen; they must be planned and reduced to a written form. They must be planned to facilitate the accomplishment of measurable objectives already developed. As the activities are "costed out," the amounts of each categorical resource required in each instructional component can be computed.

Instructional components are required in reading, language development, mathematics, and multicultural education. A school will include other instructional components in line with its program objectives.

2.5.2 Criterion-referenced objectives

In accord with the needs assessment and the established instructional objectives, the teaching staff develops criterion-referenced objectives as the basis for designing instructional activities. These objectives describe the changes in individual students that can in some way be detected if the objective is achieved. Three types of criterion-referenced objectives are described as follows:

(1) Objectives relating to student knowledge or skills. This category of criterion-referenced objective deals with student ability to demonstrate specific knowledge or to solve specific types of problems where there is no question as to the correct answers. Items of historical fact and arithmetic computations are examples.
(2) Objectives relating to student growth in social and cultural understanding. This category of criterion-referenced objective deals with the internalization by a student of new understandings in social or cultural affairs. Knowledge or skill is not at issue. The point is rather the understanding demonstrated by the student in the way he expresses himself ver-

bally or in writing or in relationships with other students. As an example, a student excursion into new territories may subsequently lead him to use images or details in his writing that reflect his experiences in the excursion.

(3) Objectives relating to student ability to create designs. This category of criterion-referenced objective deals with student ability to create designs or solve problems for which there are no unique procedures and no unique answers. Art work or other obviously creative works are examples, as are the designing and perhaps building of a six-wheel vehicle or a fireproof cage for an animal. The typical objective in this category has certain specifications for the design but unlimited latitude for the student.

2.5.3 Isolation and segregation of students

In the school's instructional program, children shall not be labeled or segregated on a racial or ethnic basis or on the basis of receiving categorical aid services. Schools shall not (1) create special tracks for the educationally disadvantaged; (2) establish adjustment, pregrade, or junior grade classes for the educationally disadvantaged; or (3) physically isolate children from their classmates on a scheduled daily basis except as follows: On the basis of a comprehensive diagnosis of needs, students assigned to a regular classroom teacher responsible for their instructional program may be moved to a physical location other than the regular classroom on a temporary basis until a diagnosed need has been alleviated. Alternative physical locations may include, but are not limited to, a reading laboratory, a mathematics laboratory, a bilingual-bicultural learning center, an intergroup education learning center, a diagnostic clinic, or similar facilities where the specific needs of the student may best be served.

2.5.4 Health and auxiliary services

A school receiving funds governed by the *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools* shall establish and operate a program component for health and auxiliary services.

2.5.5 Parent education

A school receiving funds governed by the *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools* shall establish and operate a program component for parent education.

2.5.6 Parent involvement

A school receiving funds governed by the *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools* shall develop specific plans for involving parents, and other citizens, when appropriate, in the planning and operation of the school's program.

2.5.7 Staff development

A school receiving funds governed by the *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools* shall establish and operate a program component for staff development.

2.5.8 Evaluation instrument design or selection

Program evaluation criteria are established to match the program objectives. Instruments to collect evaluation data are designed or selected to provide the most useful information possible for the improvement of program components. Recommendations for the selection of specific evaluation procedures are contained in *A Handbook for the Evaluation of Multifunded Educational Programs.*[5]

2.5.9 Resource utilization plan

The first step in the creation of a resource utilization plan is the identification of available resources. Financial resources are identified by the school district at least by the beginning of the program design phase. The district notifies the school concerning what financial resources are available to the school. Resources available from or through parents and the community are best identified by the school. The School Advisory Committee should be particularly effective here. And in designing program components, the staff should plan to rely on many resources available through the students themselves.

Resource utilization flows directly from the program component design. Any activity—from tutorial assistance in reading to study trips to

[5] *A Handbook for the Evaluation of Multifunded Educational Programs.* Prepared under the direction of Alexander I. Law, Chief, Office of Program Evaluation and Research. Sacramento: California State Department of Education, 1973.

museums to parent training activities—requires resources. The specific assignment of resources to program components is the essence of the resource utilization plan.

With some funding sources, resources are restricted as to what may be purchased. Such restrictions, of course, must be respected in the resource utilization plan. More typically, resources are designated for categories of students, usually the educationally disadvantaged. In these cases the resource utilization plan must show how the categorical resources provide extra services for the categorical students.

Although "commingling" of funds is not allowed, it is possible to use two or more sources to fund specific components if student participation is common. For example, in a school with two sources of funding for educationally disadvantaged youth, funds from each source may be used to pay aides who give extra services to the participating students. Similarly, two or more sources may be used to pay for health services. With such multiple-funded components, prorations against the funding sources are necessary in the resource utilization plan.

2.5.10 Early Childhood Education Program planning

In elementary schools competing for ECE funds, the school must prepare for a restructuring of its kindergarten and grades one through three program to provide diagnostic, individualized instruction. The program design must be comprehensive, covering all activities planned for all children in kindergarten and grades one through three. The resource utilization plan must account for all resources—local, state, and federal—available to the school, including environmental, human, and financial resources.

In contrast with other funding sources governed by the *Proposed Regulations for Consolidated Categorical Aid Programs in California Schools*, Early Childhood Education funds are available on a competitive rather than an entitlement basis. The district master plan states the order in which schools will come into the ECE program. Early in March the Department of Education will notify the district of the maximum a.d.a. increase for which it may compete. (On a statewide basis, approximately 80 percent of the competing schools will be funded.) The district then is able to identify exactly the candidate schools.

At these candidate schools, two plans will be necessary, one using ECE funds and one not using them. The school may, of course, want to plan for a substantially individualized, continuous progress program even without ECE funds. In this case the extra planning work will be related to increased number or depth of certain component activities. If a school feels that it is unable to restructure its kindergarten and grades one through three program without the additional funding, the comprehensive plan including ECE funds will be entirely a proposal. Even if unfunded in 1974-75, however, the planning will improve program quality and thereby increase the likelihood of ECE funding in a subsequent year.

2.5.11 Planning products

Planning products developed in the designing of the program are the following:

(1) A description of the categories of criterion-referenced objectives developed at the school level and a description of the way in which they are cataloged at the school level

(2) A summary of the program components of the school's comprehensive program plan (Each component will be identified, and a paragraph will be written describing each.)

(3) A resource utilization plan, which requires a record of the amounts of each categorical resource (and in the case of ECE schools, all resources) designated for use in each program component (This record shall include the extent to which various subpopulations receive services from the individual categorical resources [allowing for prorations of amounts when student participation is common]. In schools which are competing for ECE funds and are also eligible for other categorical funds, two resource utilization plans are necessary, one with ECE funds and one without.)

2.6 School Management Plan

The school plan is not complete without a management plan. Management of the school's program involves the several functions which ensure implementation of the program design.

2.6.1 Delineation of tasks and assignment of responsibilities

The basis for a management plan is a clear delineation of tasks to be performed. The tasks are first described in relation to the program design, and responsibility for each task is then assigned. As the totality of tasks will cover all facets of the program design, there will be no program remnants when the assignments are completed. The degree of overlapping responsibility is also minimized in this process.

2.6.2 An implementation time line

A means of monitoring progress is essential to sustain the program implementation. Events (milestones, perhaps) that can be verified as the year proceeds are charted in a time line. This line serves as a guide to each responsible party and helps the school principal in ascertaining the program's status. A Gantt chart or similar format for scheduling is useful.

2.6.3 A reviewing procedure

The principal and staff must develop a procedure for reviewing the status of the program and problems encountered as the year unfolds. Elaborate "feedback" systems which organize and analyze considerable data in multiple ways are possible; and a somewhat sophisticated system is appropriate if the principal and staff have the requisite skills. However, a careful comparison of actual progress against the original plan does not depend upon special sophistication. The fundamental ingredient is preparing, in advance, to review deliberately the progress along the time line.

Although some problems can be handled on an ad hoc basis as they arise, the school's reviewing procedure should include ongoing provision for problem solving. "Problems" can be defined to include adjustments in program components which may be required because of changing environmental or staff conditions.

2.6.4 Reporting procedures

The school management plan must include reference to the type and frequency of management reports to be made. These reports include all those sent to district administrators and implementation progress reports sent to parents and other members of the community. Certain other reports are issued as part of the evaluation procedures.

2.6.5 Planning products

Planning products developed in the establishment of a school management plan are the following:

(1) A record of tasks and the assignment of responsibilities for managing the school's program

(2) A time line, which can serve as a guide for each responsible party and as an aid to the school principal in ascertaining the program's status as to implementation

(3) A description of the program review and problem-solving mechanisms to be used by the professional staff as the year progresses

(4) A listing and description of the management reports to be developed at the school level, including all reports to district administrators and implementation progress reports sent to parents and other members of the community

Addendum to the Instructions for Comprehensive Program Planning

Participation of Nonpublic School Pupils

Two of the programs included in the consolidated application procedure involve the planning for the use of federal funds to provide for services to children in nonpublic schools. These are (1) Title I of the Elementary and Secondary Education Act (ESEA) of 1965; and (2) Phase 1 of Title II of the Elementary and Secondary Education Act of 1965.

The major regulations relating to the use of Title I and Title II, Phase 1, funds for children in nonpublic schools are covered in this addendum and should be considered carefully as part of the comprehensive planning process.

ESEA, Title I

Federal law requires that the local educational agency (LEA) shall provide compensatory education services designed to meet the special educational needs of the disadvantaged children residing in the districts and enrolled in *nonprofit* nonpublic schools. Services for such nonpublic school participants shall be comparable, but not necessarily identical, with those for children enrolled in public schools and shall be consistent with the number of educationally disadvantaged children in nonpublic schools and the nature and extent of their educational disadvantage.

Maximum Number of Program Participants

The maximum number of children in nonpublic schools who may be served in a Title I program should be approximately proportional to the number of children enrolled in nonprofit nonpublic schools who live in the eligible areas as compared with the total number of schoolchildren (attending both public and nonpublic schools) who live in each eligible area. (See the section entitled "Selection of Nonpublic School Participants.")

Nonpublic School Involvement in the Planning Process

Immediately after the eligible area is designated, the LEA shall contact the nonpublic school officials and continuously involve them in the identification of needs, the determination of objectives and activities, the establishment of selection criteria for children who will receive the benefits of the program, and the evaluation of the program.

In applying for Title I funds, the school district shall submit evidence that it has provided for the participation of eligible children enrolled in nonpublic schools. This evidence will be indicated by the signatures of the responsible nonpublic school officials.

Instructions for Involving Nonpublic Schools

The following instructions pertain to the involvement of nonpublic schools in Title I programs:

(1) If the school district, with the concurrence of the State Department of Education, determines that it is not feasible to provide the program services to the children attending nonpublic schools at publicly controlled facilities, only services of a therapeutic, health, remedial, or welfare nature not normally provided by the nonpublic school may be rendered on nonpublic school premises. When services are rendered on nonpublic school premises, a description of the services and the budget must be included in the consolidated application (Form A-127).

(2) The arrangements for participation of children from nonpublic schools on public school premises shall be made so as to avoid the separation of children by religious affiliation.

(3) Title I funds shall not be used to pay teachers in nonpublic schools or to construct nonpublic school facilities. Nonpublic school personnel, however, may receive remuneration for participation in Title I activities outside of their regular nonpublic school working hours.

(4) Equipment purchased with Title I funds may be placed in the temporary custody of nonpublic schools only when it is necessary for the successful implementation of the program. Title to and control over such equipment shall be retained by a public agency.

(5) Title I funds may be used to transport educationally disadvantaged children enrolled in non-

public schools to public schools if it is determined that such transportation is necessary for the participation of such children in the program.

(6) Title I funds shall at all times be under the control of and be administered by a public agency. The public agency shall be responsible for ensuring that Title I funds are used for the purpose for which they are granted.

(7) The school district shall certify that the participating nonpublic school(s) has on file with the U.S. Office of Education an Assurance of Compliance (HEW Form 441) in accordance with regulations of the U.S. Department of Health, Education, and Welfare.

(8) The school district may enter into a cooperative agreement with another school district if (a) there are educationally disadvantaged children who reside in one district but attend a nonpublic school located in another district; or (b) there is no practicable way for the district to provide for the participation of the children residing in its district who are enrolled in nonpublic schools.

Under such a cooperative agreement, the school district shall jointly provide educational opportunities geared to the needs of eligible children attending nonpublic schools and living in both school districts.

Criteria for Selecting Nonpublic School Participants

Children attending nonpublic schools and residing in the designated program or contiguous eligible areas will be qualified to receive Title I services on the basis of educational disadvantage, not on the basis of economic disadvantage. Similar educational criteria used to select children in public schools for participation shall be used to select children in nonpublic schools. (See Section 2.4.3 of *Instructions for Comprehensive Program Planning.*)

Selection of Nonpublic School Participants

The following steps should be taken in the comprehensive program planning process to determine the number of nonpublic school pupils to be served with ESEA, Title I, funds:

(1) Determine the total number of pupils of appropriate grade levels (those grade levels served by the nonpublic school) who reside in the attendance areas in which Title I funds are utilized, including those enrolled in both public and nonpublic schools.

(2) Determine for each nonpublic school (or nonpublic school system, such as Catholic parochial schools) the total number of children attending the nonpublic school(s) who live in the attendance areas where Title I funds are to be used.

(3) Divide the total number of nonpublic school pupils, determined by step 2, by the total number of pupils, determined by step 1, to determine the percent of the total who are nonpublic school pupils.

(4) Multiply the Title I grant by the percent of nonpublic school pupils (in step 3 above) and divide the result by 350 to determine the maximum number of nonpublic school pupils to be served.

All nonpublic school pupils to be served will receive comprehensive services based on their educational needs.

List of Selected Title I Participants

School district personnel are required to identify and compile a list of all Title I participants who attend public schools. Nonpublic school personnel shall identify and compile a list of all Title I participants who attend nonpublic schools and shall make the list available to public school personnel assigned to provide Title I services for children enrolled in nonpublic schools. Legitimate costs of identifying eligible area nonpublic school pupils for participation in Title I programs are to be borne by the program and shall be charged against funds available to serve such children. School districts shall not use the list of program participants to group, isolate, or segregate educationally disadvantaged children.

ESEA, Title II, Phase 1

The following federal and state regulations covering the acquisition of school library resources under ESEA, Title II, Phase 1, apply to nonpublic schools:

Federal Regulations

(1) Materials acquired with funds made available by ESEA, Title II, Phase 1, must be made available to teachers and students in nonpublic elementary and secondary schools on an equitable basis by loan. Title to the materials must be retained by the local educational agency.

(2) The level of support for any fiscal year must be maintained so that the funds supplement and in no case supplant such state, local, and nonpublic school funds budgeted for expenditure during the current fiscal year as compared to the prior two fiscal years.

(3) The funds must be made available on the basis of relative need.
(4) The funds for the nonpublic school pupils and teachers must be assigned to a public educational agency, which retains title to the materials acquired.
(5) Participation by children and teachers in *all* nonpublic schools is permitted.

California State Regulations

(1) A statement of intent to participate must be submitted to the State Department of Education at such time as stated on the form sent to the nonpublic school by the Department.
(2) The nonpublic school must submit an application to the local educational agency at such time as the LEA shall determine in order for such agency to meet its required submission date.
(3) Funds made available from ESEA, Title II, Phase 1, may not be used to acquire school library resources which are intended for religious worship or religious instruction.

Programs in Institutional Settings

ESEA, Title I, services are available to California children in institutions administered by the California Youth Authority, the Department of Corrections, the Department of Health, county institutions serving delinquent children, and public and private agencies that serve neglected children and adjudicated adults.

Title I Funds for State Institutions

Because institutions administered by the California Youth Authority, the Department of Health, and the Department of Corrections provide educational services for the total year as opposed to public schools, which provide services between the months of September and June, the institution's Title I per-pupil expenditure may vary between 50 percent and 90 percent of the statewide average expenditure per elementary pupil, depending on the nature of the educational services. However, for 1974-75 the Department will request a waiver of the regulation on minimum and maximum levels of service and instead require a minimum of $350 and a maximum of $600.

Title I Funds for Local Agencies for Neglected or Delinquent Children

Inasmuch as institutions serving the needs of neglected children generally send these children to public schools to receive educational services, the Title I per-pupil expenditure may be less than $350. However, the level of services may not be below $150 per participant.

The Title I per-pupil expenditure for delinquent children who are incarcerated and receive their total educational services in an institutional setting must be at least $350 but may not exceed $550.

Cooperative Programs

Many California districts will participate in cooperative programs to coordinate their resources to provide comprehensive educational programs. Some cooperative programs take place in rural areas of California where compliance with various sections of the consolidated application regulations is not always practicable because of distances between districts, mountainous terrain between school districts, and fewer than 60 project participants per school. Such conditions necessitate the inclusion of special provisions for cooperative programs as contained in this publication. It should be noted, however, that all other provisions contained in the consolidated application regulations must be adhered to in the development of categorically funded programs in a cooperative program.

Special Provisions of Cooperative Programs

School districts with an entitlement under ESEA, Title I, of $25,000 or less or with a composite entitlement of Title I and other categorical funds of $50,000 or less must enter into a cooperative program so that a comprehensive program for educationally disadvantaged children in those districts can be developed and implemented. In counties in which the Title I entitlements for all districts in the county total $25,000 or less, all districts in the county eligible for Title I funds must enter into a countywide cooperative program.

The State Board of Education may grant a waiver to a school district to implement a separate program if it is determined (1) that the school district's participation in a cooperative program would be impossible or impracticable because of distance or geographical isolation; or (2) that the district believes that lack of such a waiver will prevent the orderly implementation of comprehensive educational programs in that district.

A cooperative program is considered to be a single program which is subject to the same regulations for program activities as are single-district programs. Children participating in a cooperative program shall receive comprehensive services. The selection of schools shall be by district in compliance with directions under *Instructions for Com-*

prehensive Program Planning, Section 1.5, "Selection of Schools and Allocation of Categorical Resources."

The administrative agency, with the cooperation of other participating districts, is responsible for the development and implementation of the cooperative program. Each participating district shall submit to the administrative agency the data needed to develop a comprehensive program design, prepare a consolidated application (Form A-127), ensure implementation in accordance with the approved application, and prepare an annual evaluation report. Participating districts may revise and/or amend the program design only with the consent and approval of the administrative agency.

Advisory Groups in Cooperative Programs

In the establishment of the advisory structure for cooperative programs, the entire program area shall be treated as one school district. The administrative agency for the cooperative program shall establish one cooperative advisory committee for the programs. Members on the committee shall represent the areas included in the cooperative program. Cooperating school districts will establish school advisory committees at each program school in accordance with these instructions. These groups shall function as do school advisory committees in single-district programs.

In cooperative programs where school districts are so widely separated geographically that it is deemed impossible to implement the advisory structure described in these instructions, deviations from the provisions as are necessary to bring about a functional advisory structure for the cooperative programs may be made through the waiver provisions in the regulations. The concurrence of the governing boards of all cooperating school districts or their authorized representatives is required. Early Childhood Education schools must have school advisory committees in accordance with *Instructions for Comprehensive Program Planning*, Section 2.1.1, "Membership Requirements for the School Advisory Committee."

Direct Support Charges

Services provided to the cooperative program by the administrative agency shall be shown on the individual participating district's budget under the heading "Direct Support Charges." These services include centralized services such as staff development activities, evaluation activities, and instructional support activities which are contracted for by the participating districts.

Funds for Cooperative Programs

See *Management Information and Requirements for Programs Funded Through the Consolidated Application*, Section 1.0, "Funds for Projects."

Recommended Addendum to the District and School Advisory Committee Sections of the Instructions for Comprehensive Program Planning

District Advisory Committee(s)

In every district operating (or proposing to operate) programs funded through the consolidated application, the district and school advisory committees must comply with all federal and state laws and regulations. In many districts a single district advisory committee with broad representation from parent, teacher, and community groups will suffice for the district level requirement.

In other cases, however, the district may need to establish more than one district advisory committee. Alternative structures involving joint committees or co-committees are permitted as long as each is consistent with the applicable laws and regulations.

Each district advisory committee shall be composed of more than a simple majority of parents (not employed by the district) of participating children. In districts with a high concentration of educationally disadvantaged children, the committee (if it is the sole district advisory committee) shall be composed of more than a simple majority of parents of participating educationally disadvantaged children.

When more than one district advisory committee is utilized, the district's consolidated application shall include for *each* committee an assurance signed by the chairman of the committee that the committee has participated fully in the comprehensive planning process and that the recommendations of the committee have been brought to the district's governing board.

School Advisory Committees

A school advisory committee is required for each school participating (or proposed for participation) in programs funded through the consolidated application. The school advisory committee shall include broad parent representation from the socioeconomic and ethnic groups in the school attendance area. The school advisory committee shall also include representation from teachers, aides, support personnel, administrators, community service agencies and the community. Parents of participating students (not employed by the district) shall constitute more than a majority of the voting membership. In schools with a high concentration of educationally disadvantaged children, parents (not employed by the district) of participating educationally disadvantaged children shall constitute more than a majority of the voting membership.

If the district has established additional committees at a participating school, the school-level plan submitted to the Department or kept on file in the school office must include an assurance signed by the chairman of each additional committee that the committee has participated fully in the planning process and that its recommendations have been brought to the school advisory committee.

Nonpublic/Nonprofit Parent Involvement

When it is determined that children attending a nonpublic/nonprofit school are entitled to participate in a federally funded program, the authority representing such a school should maintain a school advisory committee and shall be represented on the district advisory committee.

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